

WHITEFORD, TAYLOR & PRESTON L.L.P.

WILLIAM K. WATANABE
SENIOR COUNSEL
DIRECT LINE (646) 618-8653
DIRECT FAX (646) 706-5097
KWatanabe@whitefordlaw.com

444 MADISON AVENUE
NEW YORK, NY 10022
MAIN TELEPHONE (646) 618-8660
FACSIMILE (646) 618-8659

DELAWARE*
DISTRICT OF COLUMBIA
KENTUCKY
MARYLAND
NEW YORK
VIRGINIA

WWW.WHITEFORDLAW.COM
(800) 987-8705

July 15, 2025

VIA ECF

Honorable Judge Maddox
US District Court Judge
District of Maryland, Southern Division
6500 Cherrywood Lane
Greenbelt, Maryland 20770

***Re: National Association of Black Accountants, Inc. v. White
Investments LLC, et al.
U.S. District Court, District of Maryland (Greenbelt)
8:25-cv-02002-MJM***

Dear Judge Maddox:

We write to inform you of the status of service pursuant to the Summons issued to Defendant White Investments LLC ("White Investments") on June 24, 2025.

In an effort to effect service on White Investments, Plaintiff National Association of Black Accountants, Inc. ("NABA") caused private process servers to attempt service on both White Investments' business address, located at 4747 E Moreland Street, Phoenix, Arizona 85008, as well as White Investments' resident agent's address, located at 2 East Congress Street, Suite 900, Tucson, Arizona 85701. See **Exhibit 1**, Arizona Corporation Commission Search.

On June 27, 2025, service was attempted at White Investments' business address. Upon arriving, the process server found that the address provided was a residential home and was told by the current tenant that Lene Lynn St. John, the purported manager of White Investments, is his mother, but she has not lived at the address in seven years, and her current location is unknown. See **Exhibit 2**, Affidavit of Due Diligence (Business Address).

On June 30, 2025, service was attempted at White Investments' resident agent address. Upon arriving, the process server found that the executive office for Legalcorp Solutions, LLC, White Investments' purported resident agent, was closed, the address is

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now occupied by a construction company, and there is no listing for White Investments LLC on the building directory. See **Exhibit 3**, Affidavit of Due Diligence (Resident Agent Address).

As described in Plaintiff National Association of Black Accountants, Inc.'s ("NABA") *Complaint*, upon information and belief, White Investments is a "shell corporation" that does not conduct any apparent legitimate business. See Dkt. No. 1, ¶¶ 26–30. The results of the failed service attempts seem to confirm this understanding, as despite being listed as an active corporation in the State of Arizona, White Investments does not maintain a physical business address, nor does it maintain a resident agent within Arizona.

In anticipation of this result, on June 24, 2025, NABA filed its *Motion for Leave to Take Discovery Prior to a Rule 26(f) Conference* (the "Discovery Motion"). See Dkt. No. 6. In the Discovery Motion, NABA requested that leave be granted to begin discovery to ascertain the identity of the John Doe Defendants in this matter, as "[i]t is widely accepted that in cases where discovery is necessary in order to effect service on defendants and advance a plaintiff's claims ... such discovery should be granted on the basis of irreparable harm." See Dkt. No. 6-1, at p. 4.

Due to the evidence confirming NABA's suspicions regarding White Investments' inability to be served, NABA respectfully renews its request for its Discovery Motion to be granted on the basis of irreparable harm, as the identity and location of Defendants cannot be ascertained based on the information currently available.

Should the Court require further information, we will promptly provide same.

Very truly yours,



William K. Watanabe

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